

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS PACKAGE SERVICE (FCPS)  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-2

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO  
QUESTIONS 1-3 OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 13**  
(August 20, 2021)

The United States Postal Service hereby provides its responses to the above-listed questions of Presiding Officer's Information Request No. 13, issued on August 13, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HAGENSTEIN TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 13**

1. Please refer to the Postal Service's Request at 10, stating, "For those customers who need faster delivery than would be provided under these standards, Priority Mail Express and Priority Mail – products within the Postal Service's overall package portfolio that offer a different balance of speed and cost -- would continue to be available."
  - a. Please confirm that the current rules to assign Priority Mail volume to the air versus the surface network are the same as the assignment rules for FCPS.
  - b. If part a. of this question is not confirmed, please describe how the current rules to assign Priority Mail volume to the air versus the surface network differ from the rules for FCPS.
  - c. Please confirm that the current critical entry times (CETs) for Priority Mail are the same as for FCPS.
  - d. If part c. of this question is not confirmed, please describe how the CETs for Priority Mail differ from the CETs for FCPS.

**RESPONSE:**

**1.a.** Confirmed, in part.

**1.b.** The method by which Priority Mail transportation mode is assigned is the same as FCPS and considers transit time, service performance, and cost. The service standards and Critical Entry Time (CET) both differ from FCPS, so the rules are slightly different. Under current service standards, excluding the added day for COVID, Priority Mail must arrive at destination by 22:00 Day-1, whereas FCPS must arrive at destination by 20:00 Day-2. Priority Mail has a much shorter transit window, and thus has a shorter surface reach versus FCPS.

**1.c.** Not confirmed.

**1.d.** The CET for Priority Mail at destination is 22:00. The CET for FCPS at destination is 20:00.

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- 2.** Please refer to the response to Presiding Officer's Information Request No. 7, question 1, in which the Postal Service provides non-public data estimating the proposal's impact based on applying percentages of urban and rural delivery points to the volumes originating from and/or destined to each 3-digit ZIP area.<sup>1</sup> Did the Postal Service implement any changes to its proposal based on these data?
- a. If so, please provide details of those changes.
  - b. If not, please explain why.

**RESPONSE:**

- 2.** No changes were implemented to the proposal based on the rural versus urban impact analysis.
- 2.a.** N/A.
- 2.b.** The results of the analysis did not necessitate a change. The percent impact, both from origin and destination perspective, was very similar, and 3-digit ZIP Code areas categorized as rural showed more volume upgrades and fewer downgrades.

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<sup>1</sup> Responses of the United States Postal Service to Questions 1-5 of Presiding Officer's Information Request No. 7, July 29, 2021, question 1 (Response to POIR No. 7).

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS FOTI TO  
PRESIDING OFFICER'S INFORMATION REQUEST NO. 13**

3. Please refer to the response to SH/USPS-T3-2, stating that “[f]urther, to the extent that the Postal Service maintains goals for competitive products that include FCPS, the Postal Service files information regarding competitive products with the Postal Regulatory Commission as part of its nonpublic Annual Performance Plan and Performance Report.”<sup>2</sup> Please provide a public response to the following question. Does the Postal Service intend to provide non-public service performance results and targets that isolate FCPS along with the Postal Service’s filing of the FY 2021 *Annual Compliance Report* and the Postal Service’s FY 2021 Annual Performance Report and FY 2022 Annual Performance Plan, or does the Postal Service intend to provide only composite service performance results and targets that aggregate multiple competitive products?

**RESPONSE:**

I am informed that, with respect to this aspect of the structure and content of the nonpublic portion of the FY 2021 Annual Performance Report and FY 2022 Annual Performance plan, no determination has yet been made regarding whether the Postal Service intends to provide any further information beyond the composite service performance results and targets that aggregate multiple competitive products.

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<sup>2</sup> Responses of United States Postal Service Witness Foti to Intervenor Steve Hutkins’ Interrogatories (SH/USPS-T3-1-5), July 28, 2021.